

ADDENDUM TO SETTLEMENT AGREEMENT (the “ADDENDUM”)

WHEREAS Plaintiff Jenna Ries filed a lawsuit against Defendants McDonald’s USA, LLC, McDonald’s Corporation and MLMLM Corporation in the Ingham Circuit Court, which was removed to the United States District Court for the Western District of Michigan (the “Court”), whose clerk assigned it Case Number 1:20-CV-0002 (the “Litigation”);

WHEREAS MAAKS, Inc. was later added as a defendant to the Litigation;

WHEREAS Plaintiffs and Defendants MLMLM Corporation and MAAKS, Inc. (“Settling Defendants”) entered into a Settlement Agreement (“Agreement”) that was preliminarily approved by the Court on April 5, 2022;

WHEREAS, the Agreement provided that “Settlement Class membership shall be determined by reference to a chart showing shift overlap with Shawn Banks, derived from Settling Defendants’ time punch data, and approved by Class Counsel and Settling Defendants’ counsel, attached hereto as Exhibit 5 (“Shift Overlap Chart”)”;

WHEREAS, after the Court preliminarily approved the Agreement, including Exhibit 5 thereto, the Parties discovered four women who may have worked overlapping shifts with Shawn Banks who were not included on Exhibit 5;

WHEREAS, after the Court preliminarily approved the Agreement, including Exhibit 5 thereto, the Parties discovered some clerical errors in transcribing time punch data for calculating the shift overlaps set forth in Exhibit 5;

WHEREAS, there are five women for whom Settling Defendants’ time punch records are incomplete, and for some days, provide information only about which days the women worked, but not the precise times that the women worked, thus making it impossible to determine with certainty their precise shift overlap with Shawn Banks;

WHEREAS, the Agreement provides that it shall be posted on the public website for this

class action lawsuit, but the Parties now believe that Exhibit 5 thereto, which identifies by first and last name each Settlement Class member, should not be publicly posted in its entirety, in order to protect the privacy interests of Settlement Class members;

WHEREAS, Plaintiffs and Class Counsel have concluded that the terms and conditions provided for in the Agreement and this Addendum are fair, reasonable, adequate, and in the best interests of the Settlement Class as a means of resolving the Litigation;

WHEREAS, the Settling Defendants and their counsel have determined that it is appropriate and in the best interests of the Settling Defendants to resolve the Litigation upon the terms and conditions the Agreement and Addendum provide;

WHEREAS, this Addendum has been negotiated among the Plaintiffs and the Settling Defendants (collectively the “Parties”), by their counsel, in good faith and at arm’s length; and

WHEREAS, the Parties agree to enter into this Addendum as described herein, subject to the approval of the Court, upon the terms and conditions set forth herein:

1. **Recitals.** The recitals stated above are incorporated herein and made a part hereof.
2. **Incorporation of Addendum in Agreement.** The Agreement and all of its terms shall remain in full force and effect, except as expressly revised by this Addendum.
3. **The Settlement Class.** The “Settlement Class” is defined as “All women who worked in a position below the level of Assistant Manager at the McDonald’s restaurant located at 730 North Cedar Street in Mason, Michigan during at least one shift with Shawn Banks since November 12, 2016.” Settlement Class membership shall be determined by reference to a corrected chart showing shift overlap with Shawn Banks, derived from Settling Defendants’ time punch data, and approved by Class Counsel and Settling Defendants’ counsel, attached hereto as Exhibit 7 (“Amended Shift Overlap Chart”). The original Shift Overlap Chart, Exhibit 5 to the Agreement,

shall no longer be used.

4. **Allocation of Payments to the Settlement Class.** The Plan of Allocation set forth in the Agreement provides, *inter alia*, for certain points to be allocated to Settlement Class members based on the number of shifts that they worked with Shawn Banks, based on Settling Defendants' time punch records, as follows: One point allocated to each Settlement Class member who worked between one and 10 shifts or fraction thereof with Shawn Banks, two points allocated to each Settlement Class member who worked between 11-50 shifts with Shawn Banks, three points allocated to each Settlement Class member who worked between 51-99 shifts with Shawn Banks, and four points allocated to each Settlement Class member who worked 100 or more shifts with Shawn Banks, as set forth in the Shift Overlap Chart, Exhibit 5.

(a) That portion of the Plan of Allocation is hereby amended to incorporate the Amended Shift Overlap Chart, Exhibit 7, in place of Exhibit 5.

(b) For those Settlement Class members for whom Settling Defendants' time punch records are incomplete, the Parties will assume that, with respect to days on which both they and Shawn Banks worked, but precise time punch records are missing, they worked the same proportion of shifts with Shawn Banks during those days as they did on other days for which time punch records are complete. For one Settlement Class member who worked nine days on the same days as did Shawn Banks, but for whom Settling Defendants have no time punch records, the Parties will assume that Settlement Class member worked between one and nine shifts with Shawn Banks, and allocate to her one point, as set forth in Exhibit 7.

5. **Preliminary Approval.** At the earliest practicable time after execution of this Addendum, the Parties will jointly move the Court for an Order Preliminarily Approving this

Addendum.

6. **Class Website.** The Agreement provided that the Settlement Administrator should maintain a website with information about the Settlement, including copies of the Settlement Agreement. Under this Addendum, Exhibit 5 to the Agreement shall not be placed on that website. This Addendum shall be included in the Website, except that for the Amended Shift Overlap Chart, Exhibit 7, Settlement Class Members' surnames should be deleted and replaced by initials, so that Settlement Class Members are identified only by first name and first initial of surname.

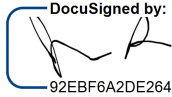
7. **Miscellaneous Provisions.**

(a) The Agreement (including its exhibits) and the Addendum (including its exhibit), together, are intended to be a full and complete expression of the Parties' agreement. They supersede any prior representation and agreement between the Parties or their legal counsel. The Agreement and Addendum may not be altered, amended, or extinguished except by a writing that expressly refers to the Agreement and Addendum and is signed subsequent to the execution of the Agreement and Addendum by all of the Parties.

(b) This Addendum may be executed in counterparts, each of which shall be deemed to be an original, and such counterparts together shall constitute one and the same instrument. Facsimile, PDF email, and Docusign signatures are acceptable for the execution of this Agreement.

(c) Each of the individuals executing this Addendum warrants that he or she has the authority to enter into this Addendum and to legally bind the party for which he or she is signing.

IN WITNESS WHEREOF, the Parties have signed this Addendum on the date set forth underneath their respective signatures.

DocuSigned by:

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Jenna Ries

Dated: May 02, 2022

Emily Anibal

Dated: May ____, 2022

MLMLM Corporation

By: Michael Dickerson
Its President

Dated: May ____, 2022

Eve Cervantez
Counsel for Plaintiffs and the Class

Dated: May ____, 2022

Katlyn Barber

Dated: May ____, 2022

Joanne Bishop

Dated: May ____, 2022

M.A.A.K.S., Inc.

By: Michael Dickerson
Its President

Dated: May ____, 2022

C. Thomas Ludden
Counsel for Settling Defendants

Dated: May ____, 2022

Jenna Ries

Dated: May ___, 2022

Emily Anibal

Dated: May ___, 2022

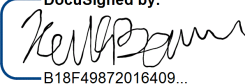
MLMLM Corporation

By: Michael Dickerson
Its President

Dated: May ___, 2022

Eve Cervantez
Counsel for Plaintiffs and the Class

Dated: May ___, 2022

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Katlyn Barber

Dated: May ² ___, 2022

Joanne Bishop

Dated: May ___, 2022

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Its President

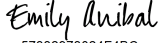
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C. Thomas Ludden
Counsel for Settling Defendants

Dated: May ___, 2022

Jenna Ries

Dated: May __, 2022

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Emily Anibal

Dated: May ⁰², 2022

MLMLM Corporation

Katlyn Barber

Dated: May __, 2022

Joanne Bishop

Dated: May __, 2022

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Its President

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Its President

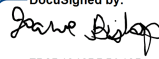
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Eve Cervantez
Counsel for Plaintiffs and the Class

Dated: May ___, 2022

Katlyn Barber

Dated: May ___, 2022

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Joanne Bishop

Dated: May ⁰²_, 2022

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Its President

Dated: May ___, 2022

C. Thomas Ludden
Counsel for Settling Defendants

Dated: May ___, 2022

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Dated: May ___, 2022

Joanne Bishop


Dated: May ___, 2022

MLMLM Corporation

M.A.A.K.S., Inc.

By: Michael Dickerson
Its President

Dated: May ___, 2022

DocuSigned by:

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Eve Cervantez
Counsel for Plaintiffs and the Class

Dated: May ² ___, 2022

By: Michael Dickerson
Its President

Dated: May ___, 2022

C. Thomas Ludden
Counsel for Settling Defendants

Dated: May ___, 2022

Jenna Ries

Dated: May ___, 2022

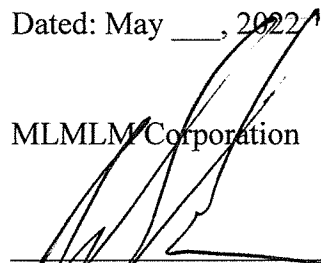
Katlyn Barber

Dated: May ___, 2022

Emily Anibal

Dated: May ___, 2022

MLMLM Corporation

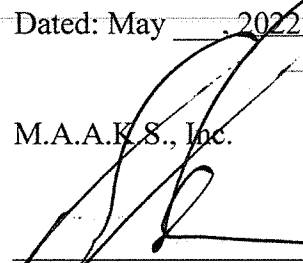

By: Michael Dickerson
Its President

Dated: May 3, 2022

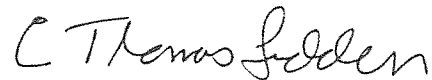
Joanne Bishop

Dated: May ___, 2022

M.A.A.K.S., Inc.


By: Michael Dickerson
Its President

Dated: May 3, 2022



Eve Cervantez
Counsel for Plaintiffs and the Class

Dated: May ___, 2022

C. Thomas Ludden
Counsel for Settling Defendants

Dated: May 3, 2022

Exhibit 7

Class Period - Sorted 3 Ways					
Alphabetically			By Shift - Descending Order		
Class Member	Total Overlap Hours	Total Overlap Shifts	Class Member	Total Overlap Hours	Total Overlap Shifts
Abigail G. Teremi	72.77	30	Shelia M. Hablitzel	792.40	281
Alexis M. Lafraugh	51.70	14	Kelandra Mackley	830.25	242
Alicia M. Mckenzie	4.82	4	Justine A. Kassab	809.37	201
Alissa D. Malcolm	13.43	5	Ashley E. Densteadt	576.80	170
Allysa M. Herban	28.05	6	Cindy M. Sword	576.42	163
Amanda R. Koehler	5.85	2	Jenna D. Ries	578.17	158
Amanda S. Green	16.67	7	Brianna Slocum	289.62	152
Amelia A. Mills	17.58	7	Katlyn M. Barber	462.90	126
Antonia L. Severs	102.82	29	*Kaylyn Mcguire	231.23	125
Ashley E. Densteadt	576.80	170	Laurel L. Jones	544.93	125
Ashley K. Hoskins	211.45	63	Leighann T. Rice	354.17	105
Belinda Llabjani	162.80	64	Melissa S. Silva	378.87	92
Blake N. Ettinger	92.07	36	Chantae K. McCormick-Downer	251.18	86
Breanna Adams	120.28	29	Sandra L. Frechette	164.63	86
Breanne M. Hendrick	23.35	8	Hannah L. Evans	187.42	83
Brenda K. Marshall	10.93	6	Emily J. Bacon	159.07	68
Briann Risner	17.80	8	Nancy J. Kendle	114.52	66
Brianna N. Barber	92.98	24	Belinda Llabjani	162.80	64
Brianna Slocum	289.62	152	Ashley K. Hoskins	211.45	63
Caitlin A. Hunt	63.20	28	Courtney T. Geren	204.62	58
Caitlin M. Merz	159.30	44	Kara A. Sweet	138.28	56
Carlee R. Kibiloski	5.40	1	*Linda Scott	19.45	54
Chantae K. McCormick-Downer	251.18	86	Joelynn E. Ferris	196.62	48
Chelsea N. Brasseur	27.67	14	Caitlin M. Merz	159.30	44
Cheyenne-Mar Goddard	31.60	8	Emma Surbrook	143.47	42
Chloe E. Anderson	86.62	27	Tammy S. Pasch	177.82	38
Cimone G. Downer	96.17	36	Blake N. Ettinger	92.07	36
Cindy M. Sword	576.42	163	Cimone G. Downer	96.17	36
Clara J. White	56.75	23	Hannah R. Chrome	109.60	34

Courtney T. Geren	204.62	58	Debra M. Clark	101.67	33
Dana L. Fancher	31.72	13	Abigail G. Teremi	72.77	30
Daytona M. Bishop	44.53	14	Julia C. Vowels	122.22	30
Deanna L. Hosek	20.63	8	Antonia L. Severs	102.82	29
Debra M. Clark	101.67	33	Breanna Adams	120.28	29
Diane M. Murray	35.37	15	Caitlin A. Hunt	63.20	28
Donna M. Miller	2.55	1	Mckayla P. Keller	100.92	28
Elizabeth I. Eddy	4.53	1	Chloe E. Anderson	86.62	27
Emily C. Anibal	79.17	23	Rene Ressler	132.38	26
Emily J. Bacon	159.07	68	*Shelby List	85.48	26
Emma Schopp	17.57	5	Taylor I. Kirby	74.77	26
Emma Surbrook	143.47	42	Brianna N. Barber	92.98	24
Erin B. Smith	4.87	2	Clara J. White	56.75	23
Gillian S. Heckman	36.27	12	Emily C. Anibal	79.17	23
Hajriz Sylejmani	21.93	4	Jennifer Greathouse	67.18	22
Hanna L. Christian	15.83	7	Sheila Mainville	43.80	22
Hannah L. Dexter	1.10	1	Rosalina L. Moreno	48.78	21
Hannah L. Evans	187.42	83	Leaha J. Sinnaeve	66.77	19
Hannah R. Chrome	109.60	34	Taylor Tilley	40.00	18
Hunter P. Harp	15.62	10	Soroyia R. Simpkins	81.77	16
Jenna D. Ries	578.17	158	Diane M. Murray	35.37	15
Jennie R. Charles	26.57	7	Alexis M. Lafraugh	51.70	14
Jennifer Greathouse	67.18	22	Chelsea N. Brasseur	27.67	14
Jennifer Johnson	1.52	1	Daytona M. Bishop	44.53	14
Jennifer L. Allen	13.70	5	Tara M. Cataline	68.20	14
Joanne R. Bishop	8.72	6	Dana L. Fancher	31.72	13
Joelynn E. Ferris	196.62	48	*Katrina Cooper	22.47	13
Julia C. Vowels	122.22	30	Gillian S. Heckman	36.27	12
Justice Russell	2.55	1	*Makayla Rinehart	30.88	11
Justine A. Kassab	809.37	201	Michelle Ries	28.18	11
Kadie A. Smith	19.12	6	Nina M. Kroupa	31.17	11
Kara A. Sweet	138.28	56	Sierra Y. Daniels	31.57	11
Katlyn M. Barber	462.90	126	Unity C. Rodriguez	22.55	11
*Katrina Cooper	22.47	13	Hunter P. Harp	15.62	10

Kayla M. Lawrence	36.97	10	Kayla M. Lawrence	36.97	10
*Kaylyn Mcguire	231.23	125	Lacey L. Gray	26.47	9
Kelandra Mackley	830.25	242	*Marcy Burch	0.00	9
Lacey L. Gray	26.47	9	Sarah C. Johnson	24.98	9
Laurel L. Jones	544.93	125	Breanne M. Hendrick	23.35	8
Leaha J. Sinnaeve	66.77	19	Briann Risner	17.80	8
Leighann T. Rice	354.17	105	Cheyenne-Mar Goddard	31.60	8
*Linda Scott	19.45	54	Deanna L. Hosek	20.63	8
Madison S. Ruthruff	6.23	4	Tatiana M. Harju	23.82	8
*Makayla Rinehart	30.88	11	Amanda S. Green	16.67	7
*Marcy Burch	0.00	9	Amelia A. Mills	17.58	7
Mckayla P. Keller	100.92	28	Hanna L. Christian	15.83	7
Melissa S. Silva	378.87	92	Jennie R. Charles	26.57	7
Mercedes K. Hicks	7.55	3	Nicole D. Luna	27.97	7
Michelle Ries	28.18	11	Allysa M. Herban	28.05	6
Nancy J. Kendle	114.52	66	Brenda K. Marshall	10.93	6
Nicole D. Luna	27.97	7	Joanne R. Bishop	8.72	6
Nina M. Kroupa	31.17	11	Kadie A. Smith	19.12	6
Olivia M. Daft	10.98	5	Sherri A. Miodowski	17.80	6
Rene Ressler	132.38	26	Alissa D. Malcolm	13.43	5
Rosalina L. Moreno	48.78	21	Emma Schopp	17.57	5
Sandra L. Frechette	164.63	86	Jennifer L. Allen	13.70	5
Sarah C. Johnson	24.98	9	Olivia M. Daft	10.98	5
Serena T. Willet	12.27	3	Alicia M. Mckenzie	4.82	4
Sheila Mainville	43.80	22	Hajriz Sylejmani	21.93	4
*Shelby List	85.48	26	Madison S. Ruthruff	6.23	4
Shelia M. Hablitzel	792.40	281	Shiloh R. Barton	5.25	4
Sherri A. Miodowski	17.80	6	Mercedes K. Hicks	7.55	3
Shiloh R. Barton	5.25	4	Serena T. Willet	12.27	3
Sierra Y. Daniels	31.57	11	Amanda R. Koehler	5.85	2
Soroyia R. Simpkins	81.77	16	Erin B. Smith	4.87	2
Tammy S. Pasch	177.82	38	Tiffany L. Bolton	5.83	2
Tara M. Cataline	68.20	14	Carlee R. Kibiloski	5.40	1
Tatiana M. Harju	23.82	8	Donna M. Miller	2.55	1

Taylor I. Kirby	74.77	26	Elizabeth I. Eddy	4.53	1
Taylor Tilley	40.00	18	Hannah L. Dexter	1.10	1
Tiffany L. Bolton	5.83	2	Jennifer Johnson	1.52	1
Unity C. Rodriguez	22.55	11	Justice Russell	2.55	1

*Estimated because time punch records are incomplete

By Hours - Descending Order		
Class Member	Total Overlap Hours	Total Overlap Shifts
Kelandra Mackley	830.25	242
Justine A. Kassab	809.37	201
Shelia M. Hablitzel	792.40	281
Jenna D. Ries	578.17	158
Ashley E. Densteadt	576.80	170
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Belinda Llabjani	162.80	64
Caitlin M. Merz	159.30	44
Emily J. Bacon	159.07	68
Emma Surbrook	143.47	42
Kara A. Sweet	138.28	56
Rene Ressler	132.38	26
Julia C. Vowels	122.22	30
Breanna Adams	120.28	29
Nancy J. Kendle	114.52	66
Hannah R. Chrome	109.60	34

Antonia L. Severs	102.82	29
Debra M. Clark	101.67	33
Mckayla P. Keller	100.92	28
Cimone G. Downer	96.17	36
Brianna N. Barber	92.98	24
Blake N. Ettinger	92.07	36
Chloe E. Anderson	86.62	27
*Shelby List	85.48	26
Soroyia R. Simpkins	81.77	16
Emily C. Anibal	79.17	23
Taylor I. Kirby	74.77	26
Abigail G. Teremi	72.77	30
Tara M. Cataline	68.20	14
Jennifer Greathouse	67.18	22
Leaha J. Sinnaeve	66.77	19
Caitlin A. Hunt	63.20	28
Clara J. White	56.75	23
Alexis M. Lafraugh	51.70	14
Rosalina L. Moreno	48.78	21
Daytona M. Bishop	44.53	14
Sheila Mainville	43.80	22
Taylor Tilley	40.00	18
Kayla M. Lawrence	36.97	10
Gillian S. Heckman	36.27	12
Diane M. Murray	35.37	15
Dana L. Fancher	31.72	13
Cheyenne-Mar Goddard	31.60	8
Sierra Y. Daniels	31.57	11
Nina M. Kroupa	31.17	11
*Makayla Rinehart	30.88	11
Michelle Ries	28.18	11
Allysa M. Herban	28.05	6
Nicole D. Luna	27.97	7
Chelsea N. Brasseur	27.67	14

Jennie R. Charles	26.57	7
Lacey L. Gray	26.47	9
Sarah C. Johnson	24.98	9
Tatiana M. Harju	23.82	8
Breanne M. Hendrick	23.35	8
Unity C. Rodriguez	22.55	11
*Katrina Cooper	22.47	13
Hajriz Sylejmani	21.93	4
Deanna L. Hosek	20.63	8
*Linda Scott	19.45	54
Kadie A. Smith	19.12	6
Briann Risner	17.80	8
Sherri A. Miodowski	17.80	6
Amelia A. Mills	17.58	7
Emma Schopp	17.57	5
Amanda S. Green	16.67	7
Hanna L. Christian	15.83	7
Hunter P. Harp	15.62	10
Jennifer L. Allen	13.70	5
Alissa D. Malcolm	13.43	5
Serena T. Willet	12.27	3
Olivia M. Daft	10.98	5
Brenda K. Marshall	10.93	6
Joanne R. Bishop	8.72	6
Mercedes K. Hicks	7.55	3
Madison S. Ruthruff	6.23	4
Amanda R. Koehler	5.85	2
Tiffany L. Bolton	5.83	2
Carlee R. Kibiloski	5.40	1
Shiloh R. Barton	5.25	4
Erin B. Smith	4.87	2
Alicia M. Mckenzie	4.82	4
Elizabeth I. Eddy	4.53	1
Donna M. Miller	2.55	1

Justice Russell	2.55	1
Jennifer Johnson	1.52	1
Hannah L. Dexter	1.10	1
*Marcy Burch	0.00	9